

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

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OFFICE OF THE CLERK

PINNACLE TELEMARKETING LTD.,)
D/B/A PCSI, a Nebraska Corporation,)

Plaintiff,)

vs.)

PAUL BLANCHARD and CATHERINE)
BLANCHARD,)

Defendants.)

CASE NO. 8:06CV756

JOINT STIPULATION
AND PROTECTIVE ORDER

It is hereby stipulated and agreed by and among the undersigned attorneys for Plaintiff and Defendant as follows:

1. Any federal income tax returns of the Defendants produced to the Plaintiff in this action shall be held in strict confidence by counsel for the Plaintiff, and shall be shown only to personnel in Plaintiff's counsel's office assisting in the preparation of this case for trial and to any experts engaged by or on behalf of the Plaintiff. Such returns shall be used solely for purposes of this action, and all copies shall be returned to the counsel for the Defendants, or destroyed, at the conclusion of the litigation.

2. Any financial records of the Plaintiff produced to the Defendants in this action shall be held in strict confidence by the Defendants and their counsel, and shall be used solely for purposes of this litigation. Such documents shall be shown only to counsel for the Defendants and employees in such counsel's office engaged in preparation of this case for trial, to the Defendants, and to any expert engaged by or on behalf of the Defendants to assist in preparation of this matter for trial. At the conclusion of this litigation, all such financial

statements and all copies shall be returned to counsel for the Plaintiff or destroyed.

PINNACLE TELEMARKETING LTD.,
D/B/A PCSI, a Nebraska Corporation,
Plaintiff

By: 

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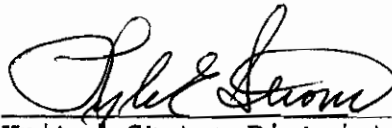
PAUL BLANCHARD and CATHERINE
BLANCHARD, Defendants

By: 

Thomas F. Hoarty, Jr. #11863
BYAM & HOARTY
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(402) 397-0303

IT IS SO ORDERED:

10/16/07
Date


United States District Judge